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December 12, 2019

Via ECF; Total Pages: 1

Hon. Sterling Johnson, Jr, U.S.D.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Cantu-Mariano v. Elite Cafe Inc. et al
Docket No. 1:17-cv-03814-SJ-RML

Dear Judge Johnson:

This office formerly represented Defendants in the above-referenced matter. I am responding to new defense counsel's Ibrahim Abohamra's letter to the court dated December 12, 2019 (Doc 51).

Initially, Mr. Aborhama sent to me an email on December 10, 2019 at 5:53 p.m. advising that he was retained. Thereafter, we finalized a Substitution of Attorney form for filing with Mr. Aborhama, which was filed on December 11, 2019 (Doc 50). I have emailed to Mr. Aborhama a copy of the defendants' litigation file today, December 12, 2019.

Mr. Aborhama states in his December 12, 2019 letter (Doc 51) that he has sent "multiple" Text messages to me requesting a copy of the file. This is completely false statement. I have not received any text messages from Mr. Aborhama whatsoever.

Mr. Aborhama states in his December 12, 2019 letter (Doc 51) that he has made "multiple" phone calls to our office with no response. This is completely false. I received one phone message from Mr. Aborhama, on or about December 11, 2019, concerning his initial substitution as counsel for defendants.

Thank you for your kind courtesies in addressing this matter.

Respectfully submitted,

Michael K. Chong

Michael K. Chong, Esq.

MKC/
cc: Louis Leon, Esq. (*via ECF*)